

RAYMOND NARDO

ATTORNEY AT LAW

129 THIRD STREET
MINEOLA, NY 11501

(516) 248-2121 (TEL)

(516) 742-7675 (FAX)

raynardo@juno.com

June 20, 2008

BY FAX ONLY
(212) 805-4258

Hon. Debra C. Freeman
United States Magistrate Judge Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: Vodopia v. Koninklijke Philips Electronics, et. al.
(07-6214)

Hon. Debra C. Freeman,

This is a joint letter, as requested by the Court during our most recent telephonic conference, regarding the status of the above-captioned case.

Defendants' Motions to Dismiss are still pending. The parties have exchanged drafts and have had discussions regarding a detailed protective order, but they have not yet been able to complete these discussions and resolve all issues. At this time, the parties are agreeable to allowing this Court's November 29, 2007 Order serve as an "interim protective order" for an additional 45 days pending a ruling on Defendants' Motions to Dismiss. If one or both of defendants' Motions to Dismiss are denied within that time frame, the parties will reconvene discussions regarding the detailed protective order (and will seek assistance from the Court only if these discussions reach impasse).

If both of the Motions to Dismiss are granted, Plaintiff and Plaintiff's counsel will abide by the courts' orders regarding the documents, without prejudice to the possibility of Defendants seeking additional judicial relief if the Court does not explicitly order Plaintiff to return all of Philips' documents.

The parties intend to identify all disputes regarding the draft protective order currently circulating and will continue to attempt to resolve these issues. If they cannot be resolved, the

*Parties to submit a further
joint status report by August 29,
2008*

SO ORDERED: DATE: 6/25/08

.....*Debra Freeman*.....

DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

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parties will set forth their respective positions in another joint letter to the court within 45 days.

With respect to this case generally, the parties are agreeable to allowing the "status quo" to continue while continuing to work on the protective order.

Thank you for your assistance with this matter.

Respectfully submitted,

RAYMOND NARDO

Robert C. Petrusis (KUS)

BOB PETRULIS